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March 2, 2011

***Via Electronic Submission***

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room TW-A325  
Washington, D.C. 20554

**Re: Ex Parte Communication**

*WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109*

Dear Ms. Dortch:

This letter is to inform you that Pete Sywenki and Charles McKee of Sprint Nextel Corporation ("Sprint"), met with Christine Kurth, Policy Director & Wireline Counsel to Commissioner McDowell, on March 1, 2011, to discuss the Commission's recently issued Notice of Proposed Rulemaking on reforming intercarrier compensation rules and the universal service fund.

Sprint expressed support for the general direction laid out in the NPRM to promote greater efficiency by eliminating per minute intercarrier charges and by injecting some fiscal discipline into universal service support mechanisms. Sprint focused on the need for immediate action to address traffic pumping, intercarrier compensation for VoIP traffic, and phantom traffic. In particular, we expressed concern that the NPRM's traffic pumping proposals will not effectively curb and prevent the spread of traffic pumping activities if it fails to include an effective trigger or does not limit rates to a level that is cost based. Sprint emphasized that the Commission must avoid categorizing pumped traffic as access traffic; and that, to the extent that the Commission allows any intercarrier compensation for this type of traffic, it should be based on the reciprocal compensation framework embodied in the 1996 Act (not the defunct access tariff regime) including a rate cap no higher than the cap the FCC adopted for ISP-bound traffic.

Sprint also discussed the efficiencies of packet networks vs. circuit-switched networks and how appropriate compensation on VoIP traffic would promote the deployment of efficient networks, interconnection, and traffic exchange. Sprint's arguments were consistent with its previous filings in these dockets.

Ms. Marlene H. Dortch, Secretary  
Sprint Notice of *Ex Parte* Communication (WC Docket No. 10-90, *et al.*)  
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Pursuant to Section 1.1206 of the Commission's Rules, a copy of this letter is being filed electronically in the above-referenced dockets. If you have any questions, please feel free to contact me at (703) 433-3786.

Respectfully submitted,

/s/ Charles W. McKee  
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cc (*via* e-mail): Christine Kurth